

IN THE UNITED STATES COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

RECEIVED
JUL 15 2024
U.S. District Court
Middle District of TN

RANDEL EDWARD
PAGE, JR.,
Plaintiff,

VS

UNITED STATES OF
AMERICA, et al.,
Defendants.

No. 3:23-cv-00851

JUDGE CAMPBELL

MAGISTRATE JUDGE
NEWBERN

AFFIDAVIT OF FACT IN SUPPORT OF COMPLAINT

I, RANDEL EDWARD PAGE JR., on this 12th day of July 2024, hereby declare that the following statements are true and correct.

FACTS

1. The Affiant objected to Magistrate Judge Newbern's REPORT AND RECOMMENDATION because the Affiant did not consent to the Magistrate Judge's referral. (Doc. No. 50 & 50-1) Motions for injunctive relief were filed with the Court by the Affiant. The injunctive process is outside the scope and jurisdiction of the Magistrates authority. The REPORT AND RECOMMENDATION filed in the Court by the Magistrate is null and void ab initio, nunc pro tunc because of the Magistrates Judges ultra vires actions. Any further ultra vires actions by the Magistrate would cause additional harm and damages to the Affiant.

2. Tennessee Attorney General Jonathan Skrmetti was a partner at Butler Snow law firm while Butler Snow was participating in the conspiracy to steal Affiants Identity and Property. The Affiant sent an email to the Department of Justice and provided substantial and material evidence to the ("DOJ") regarding Butler Snow law firm and Evans Petree law firm's violations against the affiant. The conflict of interest precludes the Attorney General from representing the STATE OF TENNESSEE in this matter and violates the Affiants equal protection of due process under the law.

Exhibit A

3. As part of the conspiracy, the former Chairman of the Board for Methodist Le Bonheur Healthcare "Edwin Roberson" asked the Affiant to meet with Baptist Memorial Health Care Corporation's legal representation "Harris Shelton" law firm. Attorney and member of Harris Shelton law firm "Michael Rafferty" was present at this meeting. The Affiant was asked about his knowledge of fraud and racketeering schemes committed in Shelby County Tennessee. Harris Shelton law firm's witness tampering and obstruction of justice has caused financial damages and irreparable damages to the Affiant.

Exhibit B

4. The Affiant contacted the Attorney General's office for the STATE OF TENNESSEE and requested to speak with the director of the Civil Rights division. As part of the conspiracy, the Attorney General's Office ignored the Affiant's request and fraudulently neglected to protect the Affiant from Civil Rights violations. Direct evidence of the conflict of interest and denial of due process is in the possession of the Department of Justice.

Exhibit C

5. BAPTIST MEMORIAL HEALTH CARE CORPORATION's blanket denial of allegations is not a rebuttal of the Affiants affidavit; therefore, the Affidavit stands as truth and fact on the record. Denial of the Affiant's legal rights by the UNITED STATES, and the illegal use of the Affiants stolen property by the UNITED STATES et al violating 15 USC § 1 § 2 has caused financial damage and irreparable damage.
6. Because of the fraud committed against the Affiant's mother, the Affiant discovered AstraZeneca's participation in the conspiracy. The nefarious use of the Affiant's stolen property and Fraud on the Court in Case No. 3:17-CV-902 has caused harm and damages to the Affiant.

Exhibit D

7. As part of the conspiracy, the affiant received a Facebook friend request from Chief Dale Lane of the Town of Collierville Police Department located in Shelby County Tennessee. The Affiant met with Chief Lane regarding the conspiracy against his Civil Rights. Chief Lane and the Collierville Police Department refused to take in the Affiant's evidence. After meeting with the Collierville Police Department, the Affiant received a call from agent Joe Herman of the Federal Bureau of Investigation. The Affiant attempted to contact Mr. Herman at the ("FBI"). The Affiant's call was sent to an automated messaging system whereby the Affiant was threatened with the confiscation of his weapons.

Exhibit E

8. The Affiant was interviewed by the Shelby County Tennessee's District Attorney's Office. A representative from the District Attorney's Office contacted the Affiant to confirm the acceptance of the Affiants evidence and a memo of the interview delivered to District Attorney Steve Mulroy. The District Attorney's representative communicated that assistant District Attorneys Dennis Johnson and Ray Lapone would be contacting him. The Affiant left messages for Mr. Johnson and Mr. Lapone. The Affiant has not received a return call.
9. The affiant's former counsel and co-conspirator "John Turner" committed fraud against the Affiant. Mr. Turner's fraud led to the attempt to have the Crone law firm represent the Affiant. As part of the conspiracy attorney John Turner referred attorney Richard Glassman to the Affiant. Mr. Glassman informed the affiant that he represents Evans Petree law firm, the City of Memphis and Judge Mary Wagner.

Exhibit F

The Affiant has taken action to protect his life, liberty and property.

The Affiant reserves all rights under the rule of law to enforce and impose legal remedy for vindication and redress for the violations of his Civil Rights.

Rank P...

Signature

Sworn to before me this 12th day of JULY, 2024



Subscribed and sworn to before me in my presence, this 12 day of JULY 24, a Notary Public in and for the County of DE SOTO State of MS

[Signature]
(Signature) Notary Public

My Commission Expires MAY 23 2028

I Randel Edward Page Jr. hereby certify that on July 12th, 2024, a true and correct copy of the foregoing was served via US Mail to the following:

United States of America

Melissa Russell

US Attorney's Office

110 Ninth Avenue South, Suite A 961

Nashville, Tennessee 37203

Emily Hamm Huseth

Harris Shelton Hanover Walsh, PLLC

6060 Primacy Parkway, Suite 100

Memphis, Tennessee 38119

Counsel for Defendant Epic Systems
Corporation

Joel E. Tragesser

135 N. Pennsylvania St., Suite 2400

Indianapolis, IN 46204

John Thomas

Mackenzie Hobbs

Barnes & Thornburg LLP

827 19th Avenue South Suite 930

State of Tennessee

Heather C. Ross

Office of the Attorney General of Tennessee

500 Charlotte Avenue

Nashville, TN 37219

Buckner Wellford

Brigid M. Carpenter

Baker, Donelson, Bearman, Caldwell

& Berkowitz, P.C.

1600 West End Avenue, Suite 2000

Nashville, Tennessee 37203

Chad M. Jackson

Morgan, Akins & Jackson, PLLC

10 Burton Hills Blvd., Suite 210

Nashville, TN 37215



Do not fold or bend

1 LBS 1 OF 1
SHIP WT: 1 LBS
DATE: 12 JUL 2024

RECEIVED
JUL 15 2024

SHIP MIDDLE DISTRICT ATTN CLERK OFC
TO: UNITED STATES DISTRICT COURT
719 CHURCH ST
NASHVILLE TN 37203-6944
U.S. District Court
Middle District of TN

UPS GROUND
TRACKING #: 1Z X82 207 03 1837 7164

BILLING: P/P

TEN 25.00Z ZCP 450 25.0V 06/2024

4539